

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA, )  
 )  
Petitioner, )  
 )  
v. ) Civil No. SA19CA0242  
 )  
\$840,000.00 MORE OR LESS, IN )  
UNITED STATES CURRENCY, )  
 )  
Respondent. )

**CLAIMANT WHITE ENERGY LLC'S ANSWER TO  
VERIFIED COMPLAINT FOR FORFEITURE**

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Claimant White Energy LLC (“Claimant”), pursuant to Rule G(5)(b) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, files this Answer to the Verified Complaint for Forfeiture (the “Complaint”) (ECF No. 2), and it respectfully would show the Court as follows:<sup>1</sup>

**I. NATURE OF ACTION**

1. Claimant admits that this is an in rem action brought against the property identified in the Complaint (the “Currency”).

**II. JURISDICTION AND VENUE**

2. Admitted.
3. Admitted.

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<sup>1</sup> The Complaint does not contain numbered paragraphs, but White Energy will attempt to identify each paragraph as if it were numbered.

### **III. STATUTORY BASIS FOR FORFEITURE**

4. Claimant lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Section III of the Complaint, and it therefore denies those allegations.

### **IV. FACTS IN SUPPORT OF VIOLATIONS**

5. Claimant lacks knowledge or information sufficient to form a belief about the truth of the allegations contained and incorporated in Section IV of the Complaint. Claimant alleges, however, that its rights in the assets are superior to the forfeiture rights, if any, of Petitioner.

### **V. PRAYER**

6. Claimant denies that, to the extent of Claimant's interest in the Currency, as described in its Verified Claim (ECF No. 7), Petitioner is entitled to forfeiture. Claimant lacks knowledge or information sufficient to admit or deny that Petitioner is entitled to the relief it seeks.

### **FIRST DEFENSE**

7. As more fully described in its Verified Claim, Claimant has valid and enforceable interests in the Currency that are superior to the rights, if any, of the Petitioner.

### **JURY DEMAND**

8. Claimant demands a trial by jury of all issues of fact.

WHEREFORE, PREMISES CONSIDERED, Claimant respectfully requests that the Court deny the relief requested by the Petitioner to the extent of Claimant's interests in the Currency and grant Claimant such other and further relief to which it may be entitled.

Respectfully submitted,

/s/ Joel R. Sharp

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**ATTORNEYS FOR CLAIMANT**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing Answer was served via the ECF System upon all attorneys of record including Assistant United States Attorney Mary Nelda Valadez on this 1<sup>st</sup> day of July, 2019.

/s/ Joel R. Sharp

Joel R. Sharp